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June 24, 2020

**VIA ECF**

Honorable Joseph A. Dickson, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *White, et al. v. Samsung Electronics America, Inc., et al.*,  
Case No. 17-1775 (MCA)(JAD)  
Proposed Stipulation and Order Regarding Severance Under FRCP 21,  
Consolidation and Scheduling**

Dear Judge Dickson:

Gibbons PC, along with Covington & Burling LLP, represents Defendant Samsung Electronics America, Inc. ("Samsung"). On behalf of all parties in this matter, we respectfully submit the annexed Proposed Stipulation and Order Regarding Severance Under FRCP 21, Consolidation and Scheduling.

Among other things, the Proposed Stipulation and Order resolves Defendant Sony Electronics Inc.'s Motion to Sever under Federal Rule Civil Procedure 21, ECF Nos. 141 and 142, adjusts the briefing schedule on the Defendants' pending Motions to Compel Individual Arbitration, ECF Nos. 138, 140 and 143, and adjusts certain dates for initial discovery and a court status conference.

As a result of the agreements reached by the parties as specified in the annexed Proposed Stipulation and Order, the previous stipulation submitted on behalf of all parties on June 5, 2020, ECF 146-1, is rendered moot.

If the Proposed Stipulation and Order submitted herewith meets with Your Honor's approval, we ask that it be executed and entered on the docket.

Respectfully submitted,

s/ Michael R. McDonald  
Michael R. McDonald

cc: All Counsel of Record (via ECF)